

EXHIBIT 4

STATE OF MICHIGAN

36TH DISTRICT COURT
3rd Judicial CircuitAMENDED
COMPLAINT
FELONY20087070.
CASE NO: 2008707051

The People of the State of Michigan

VS

KWAME KILPATRICK 82-08707051-01
CHRISTINE BEATTY 82-08707051-02MAR 25 2008
MAR 25 2008

Offense Information

Police Agency / Report No.
82WCPO 08-6314Date of Offense
05/2003 - 12/2007Place of Offense
CITY OF DETROIT

Complainant or Victim

STATE OF MICHIGAN

Complaining Witness

DET. BRIAN WHITE

08-58169

STATE OF MICHIGAN, COUNTY OF WAYNE

The complaining witness says that on the date and the location stated above, the defendant, contrary to law,

COUNT 1 DEFENDANT(S) (01,02): CONSPIRACY- LEGAL ACT/ILLEGAL MANNER

did unlawfully conspire, combine, confederate and agree together with each other and others to commit the following listed offense: Obstruction of Justice; contrary to MCL 750.157a. [750.157A]
FELONY: 5 Years and/or \$10,000.00

COUNT 2 DEFENDANT(S) (01, 02): OBSTRUCTION OF JUSTICE

did commit the crime of obstruction of justice by firing Gary Brown to wilfully and corruptly hamper, obstruct and/or interfere with a criminal investigation and/or commit perjury to hide the firing of Gary Brown and/or the relationship between Christine Beatty and the Mayor; contrary to MCL 750.505. [750.505-A]
FELONY: 5 Years and/or \$10,000.00

COUNT 3 DEFENDANT(S) (01, 02): COMMON LAW OFFENSES

did commit misconduct in office, an indictable offense at common law, by firing Gary Brown to wilfully and corruptly hamper obstruct and/or interfere with a criminal investigation of the Mayor's personal conduct or EPU conduct and/or committing perjury to hide the firing and the true nature of their relationship; contrary to MCL 750.505. [750.505-C].
FELONY: 5 Years and/or \$10,000.00

COUNT 4 DEFENDANT(S) (01): COMMON LAW OFFENSES

did commit misconduct in office, an indictable offense at common law, as the Mayor for the City of Detroit, authorized the City of Detroit to enter into an 8.4 million dollar settlement of the Gary Brown/Nelthorpe and Harris litigations with the corrupt motive of preventing the release of text messages or other information evidencing that Mayor Kilpatrick and his Chief of Staff Christine Beatty lied under oath; contrary to MCL 750.505. [750.505-C]
FELONY: 5 Years and/or \$10,000.00

COUNT 5 DEFENDANT(S) (01): PERJURY - COURT PROCEEDING

did being lawfully required to depose the truth as a witness in the jury trial, a court proceeding in the case of Gary Brown and Harold Nelthorpe v. Kwame Kilpatrick and City of Detroit, Case Number 03-317557-NZ, the case being a civil lawsuit before the Honorable Michael J. Callahan, for the Third Circuit Court for County of Wayne on August 29, 2007, commit perjury by testifying he did not fire Gary Brown; and/or testifying that he did not know Gary Brown was investigating him or the Menoogian Mansior Party prior to his "un-appointment"; and/or testifying falsely as to other circumstances surrounding the termination of Gary Brown including the reasons for the termination and how and why the decision was made; contrary to MCL 750.422. [750.422-B]
FELONY: 15 Years

COUNT 6 DEFENDANT(S) (01): PERJURY - COURT PROCEEDING

did being lawfully required to depose the truth as a witness in a jury trial, a court proceeding in the case of Gary Brown and Harold Nelthorpe v. Kwame Kilpatrick, City of Detroit, Case Number 03-317557-NZ, the case being a civil lawsuit before the Honorable Michael J. Callahan, for the Third Circuit for County of Wayne on August 29, 2007, commit perjury by testifying did not have a romantic or sexual relationship with Christine Beatty; contrary to MCL 750.422. [750.422-B]
FELONY: 15 Years

COUNT 7 DEFENDANT(S) (02): PERJURY - COURT PROCEEDING

did being lawfully required to depose the truth as a witness in a jury trial, a court proceeding in the case of Gary Brown and Harold Nelthorpe v. Kwame Kilpatrick and City of Detroit, Case Number 03-317557-NZ, the case being a civil lawsuit before the Honorable Michael J. Callahan, for the Third Circuit Court for County of Wayne on August 28, 2007, commit perjury by testifying Gary Brown was not fired; and/or testifying that she did not know Gary Brown was investigating the Mayor or the Manogian Mansion Party prior to his "un-appointment"; and/or testifying falsely as to other circumstances surrounding the termination of Gary Brown including the reasons for the termination and how and why the decision was made; contrary to MCL 750.422. [750.422-B]

FELONY: 15 Years

COUNT 8 DEFENDANT(S) (02): PERJURY - COURT PROCEEDING

did, being lawfully required to depose the truth as a witness in a jury trial, a court proceeding in the case of Gary Brown and Harold Nelthorpe v. Kwame Kilpatrick and City of Detroit, Case Number 03-317557-NZ, the case being a civil lawsuit before the Honorable Michael J. Callahan, for the Third Circuit Court for County of Wayne on August 28, 2007, commit perjury by testifying she did not have a romantic or sexual relationship with Mayor Kilpatrick and she did not use her Sky-Tel communication device to send or receive messages of a personal or sexual nature to Defendant Kilpatrick; contrary to MCL 750.422. [750.422-B]

FELONY: 15 Years

COUNT 9 DEFENDANT(S) (01): PERJURY - OTHER THAN COURT PROCEEDING

did, being a person of whom an oath was required by law, wilfully swear falsely before Sheila D. Rice, a Notary Public within the County of Wayne, on June 26, 2004 as to the circumstances surrounding the "un-appointment" of Gary Brown; contrary to MCL 750.423. [750.423]

FELONY: 15 Years

COUNT 10 DEFENDANT(S) (01): PERJURY - OTHER THAN COURT PROCEEDING

did, being a person of whom an oath was required by law, wilfully swear falsely before Sheila D. Rice, a Notary Public within the County of Wayne, on October 11, 2004 as to the circumstances surrounding the "un-appointment" of Gary Brown; contrary to MCL 750.423. [750.423]

FELONY: 15 Years

COUNT 11 DEFENDANT(S) (02): PERJURY - OTHER THAN COURT PROCEEDING

did, being a person of whom an oath was required by law, wilfully swear falsely before Sheila D. Rice, a Notary Public within the County of Wayne, on December 9, 2003 she did not know Gary Brown was investigating the Manogian Mansion party prior to his un-appointment and/or or other circumstances surrounding the termination of Gary Brown; contrary to MCL 750.423. [750.423]

FELONY: 15 Years

COUNT 12 DEFENDANT(S) (02): PERJURY - OTHER THAN COURT PROCEEDING

did, being a person of whom an oath was required by law, wilfully swear falsely before Sheila D. Rice, a Notary Public within the County of Wayne, on December 8, 2003, she was not aware of Mayor's philandering; contrary to MCL 750.423. [750.423]

FELONY: 15 Years

Upon conviction of a felony or an attempted felony court shall order law enforcement to collect DNA identification profiling samples.

The complaining witness asks that defendant be apprehended and dealt with according to law.

Warrant authorized on 3-24-08	by:
Date	
Kym Worthy P39875	

Complaining witness signature	
Subscribed and sworn to before me on 3/24/08	Date
Judge/Magistrate/Clerk	Bar no.